

April 5, 2000

Utah Coal Regulatory Program Division of Oil, Gas and Mining 1594 North Temple, Suite 1210 Box 145801 Salt Lake City, Utah 84114-5801

Attention:

Daron Haddock

Permit Supervisor

Re:

Abandonment of Mining Machinery, PacifiCorp, Deer Creek Mine, ACT/015/018, Emery

AECEIVE

APR 10 2000

DIVISION OF

OIL, GAS AND MINING

County, Utah

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, herewith submits a response to the Division concerning abandonment of mine machinery in the Deer Creek Mine. PacifiCorp, on November 24, 1999 submitted a request to the Bureau of Land Management for a "Lease Term and Condition Modification Request; Removal of Machinery, Federal Lease U-06039."

Federal Coal Lease U-06039 (modified on February 11, 1999) includes stipulations; Sec. 10 - Delivery of Premises, Removal of Machinery, Equipment, ETC and Sec. 15 - Special Stipulations 24: WASTE CERTIFICATION, which documents abandonment of mine machinery within the federal coal lease. PacifiCorp worked closely with the BLM during development of "Special Stipulations 24." It was PacifiCorp understanding that this material did not qualify under the stipulations listed in the federal coal lease, however, courtesy notification was given to the BLM.

As documented in the November 24, 1999 request to the BLM, the 11th East Longwall face, extracted in early December 1999, was made up of hydraulic roof supports, face conveyor drives, face conveyor line pans, stageloader, crusher, belt tailpiece and face electrics. All equipment, with exception of the longwall conveyor line pans, were fully recovered during the extraction of the 11th East Longwall. The equipment abandoned consist of 140 HBI (1000mm X 1500mm) conveyor line pans with face and gob side accessories consisting of toe plates, clevises, cable trays, bretby tray, spill plates and dynatrac castings (see attached map). No hoses, cables, lubricants, and/or oils of any kind were requested to be included in the abandonment.

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Energy West made every reasonable effort to economically recover and salvage the referenced face conveyor line pans prior to panel extraction. However, due to the equipment's condition and low market scrap prices for steel, it was not reasonable or economical to recover the referenced machinery parts.

To comply with the Division's request, PacifiCorp has provided the following:

- A map identifying the location of the line pan (see attached map)
- ▶ Description of the longwall component:

The longwall component abandoned consist of 140 HBI (1000mm X 1500mm) conveyor line pans with face and gob side accessories consisting of toe plates, clevises, cable trays, bretby tray, spill plates and dynatrac castings (see attached map). No hoses, cables, lubricants, and/or oils of any kind were requested to be included in the abandonment.

Revision to the Probable Hydrologic Consequences section of the permit (Volume 9: Hydrologic Section) is not necessary. Structurally, the material abandoned is similar to the primary/secondary roof support systems utilized during the mining process. As discussed in Volume 11, Deer Creek MRP: North Rilda Area, the dip of the strata is to the east and intercepted groundwater will not contribute to the surface discharge system upon completion of mining.

The information submitted in this letter is provided as a courtesy to the Division. As you are aware it is PacifiCorp's position that the subject matter of this letter is not within the jurisdiction of the Division. PacifiCorp reserves the right to deny the Division access to such information in the future should it choose to do so. If you believe this position to be in error we would be happy to receive your written explanation as to the regulations you believe provide such jurisdiction or authority.

If there are any questions or concerns please call Chuck Semborski at 687-4720 or Dennis Oakley 687-4825.

Sincerely,

Charles A. Semborski

Geology and Environmental Supervisor

enclosures:

cc:

Blake Webster Carl Pollastro Chuck Semborski

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